



U.S. Department of Justice

United States Attorney
Southern District of New York86 Chambers Street
New York, New York 10007

April 28, 2008

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/29/08

MEMO ENDORSED

VIA FACSIMILE & HAND DELIVERY

Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007-1312

Re: Sehnaz Oner and Ahmet Yilmaz v. USCIS,
08 Civ. 1697 (PKC)

Dear Judge Castel:

I write respectfully to request a sixty-day extension of time, from April 28, 2008, to June 27, 2008, to respond to the complaint in the above-referenced civil action. This is the Government's first request for an extension.

This is a mandamus action in which the plaintiffs, husband and wife, seek an order compelling United States Citizenship and Immigration Services ("CIS") to adjudicate Mr. Yilmaz's application for adjustment of status. After the complaint was filed, this Office was informed by CIS that on April 28, 2008, Mr. Yilmaz was scheduled for an appointment with CIS to review his application. Accordingly, we request a sixty-day extension of time to provide CIS additional time to adjudicate Mr. Yilmaz's adjustment application. Plaintiffs' counsel, Stephen A. Katz, consents to this request for an extension of time.

I thank the Court for its consideration of this request.

Respectfully,

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York

By:

Kirti Vaidya Reddy
KIRTI VAIDYA REDDY
Assistant United States Attorney
(212) 637-2751

Application granted
SO ORDERED
[Signature]
WPS
4-29-08

cc: Stephen A. Katz, Esq.
Stephen A. Katz, P.C.
111 John Street, Suite 800
New York, NY 10038-3180